

Response to NHTSA-1998-4369-3

Maxon believes that the rule was correct to require “Tuck under” style liftgates to meet the under ride requirements of the corresponding regulation. Maxon and other companies have successfully designed, tested, and manufactured under ride devices that are able to meet the regulation and see no reason why this product should be excluded from the regulation. The law is written for the purpose of “improving safety by requiring guards on as many trailers as possible with out overburdening small manufactures or imparting the usefulness of rear-mounted, work performing equipment,” therefore, it is in the best interest to continue to require an under ride device on semi trailers, as no such burden is in place. The current regulations calls for specific location and strength requirements of the under ride device which are able to be met with current liftgate designs.

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